

Q&A's Supervisor Hearing – Parcel G Task Specific Plan

Question: How could you allow less than 100% full excavation for retesting? I think that a lot of contamination was left behind, so you will miss it.

Answer: EPA recommended to the Navy that trench excavation start in Parcel G in the 33% of trenches with greatest signs of concerns. If contamination is found to remain in any of these trenches above the cleanup standards, EPA and the State of California require that the Navy must excavate 100% of trenches at Parcel G. If we don't find contamination in the 33% of trench sections with the highest concerns, then we will still require retesting in all other trenches on Parcel G. The retesting would include both 100% surface scans under the protective cover (cement and soil), which is the place that is most likely to expose residents upon future development. We will also require underground samples drilled to locations deeper and wider than the previous trenches. The Navy has stated in the past it believes minimal radiological contamination, if any at all, remains in the locations where Tetra Tech EC Inc. previously did work. EPA believes it is more likely that the falsification under-represented the true potential extent of radiological contamination present. The approach we recommended allows appropriate protective responses for different potential scenarios.

Commented [LL1]: A previous reviewer recommended conveying this concept. Another reviewer recommends leaving it out. Does anyone else want to weigh in?

Question: I think you are trying to avoid finding problems. I don't trust statistics. Even if I did trust statistics, 95% confidence is not good enough. What if I live in the 5% that is not safe?

Answer: We have a sound approach using statistics to achieve a high confidence level that the site would be clean. If the first 33% of sections of trenches is clean, which gives 95% confidence that 95% of trenches are clean, then we agree that would not be good enough. We want higher confidence too. Therefore we would still require more retesting in all the remaining sections of trenches.

Question: How can you be sure you caught the problems in the first 33%? What if the unknown big spill is right next to where you stopped digging?

Answer: Survey units for priority sampling will be selected based on criteria including the following:

- a. Historical indicators of potential contamination
- b. Signs of potential falsification found in data evaluation
- c. Signs of data quality problems found in data evaluation
- d. Allegations from former workers
- e. Independent field testing, e.g. EPA scans of cleanup sites

These approaches will increase the likelihood of finding any areas with contamination. If contamination is found in even one section of trench, then 100% of trenches will need to be dug out. In addition, on all the other trenches, we will require core samples and 100% surface scans. If there is significant contamination, then scanning and core samples should find it.

Question: Surface scans will miss potential deeper contamination, especially discrete rad objects, like deck markers or radium dials. If workers are digging, they could get exposed to radiation.

Answer: The approach we propose will minimize the risk of leaving contamination behind through a scientifically sound, comprehensive system of testing in multiple ways. We already know of certain locations where radiological objects are most likely to be found, and specific efforts are already underway or completed to find and clean those up. Radiological objects have seldom been found outside of these known areas. If even a single spot of contamination is found in the locations of greatest concern, then all 100% of trenches in Parcel G would have to be dug out. Workers who are digging in any parts of the Shipyard will receive training on looking for signs of multiple types of hazards, including radiological objects.

Question: What about the other parcels beside Parcel G? Will you let them off the hook too?

Answer: These recommendations apply only to Parcel G, which we understand is the next parcel proposed for transfer to the City. Other parcels will be treated on a case-by-case basis.

Question: If you have a fail in step 2, then why would you only require digging out only that single trench? Why not require 100% excavation of all trenches in Parcel G?

Answer: If 33% are clean, we would still have 95% confidence that 95% of trench sections are clean, even if one trench unit fails in Step 2. If multiple Step 2 survey units have contamination, then additional survey units may need 100% full excavation and treatment in a manner similar to the Original ROD.

NEW MATERIAL NOT IN PREVIOUS VERSION:

Question: What does EPA think of the Navy's draft Parcel G workplan just released?

Answer: EPA has just received the draft plan at the same time as the public. We are reviewing it and will provide our comments in writing when we complete our review.

Question: But EPA reviewed the February draft. What did you think of that?

Answer: EPA's comments on the previous draft were that "the actions proposed in the draft Work Plan would not be sufficient to demonstrate protection of human health and the environment to an extent that would allow for EPA approval of property transfer of affected parcels. More extensive sampling and analysis needs to be done to address potential exposure to workers and future residents due to the uncertainty regarding the potential extent of contamination." We are reviewing the new draft and will provide comments on that.

Question: Why didn't EPA give the public its previous comments on this and other Navy drafts? Why did it take FOIA requests to make those public?

Answer: The normal process is that the Navy gives regulators drafts, regulators comment on those drafts, and through dialogue the Navy revises its drafts to create consensus documents before those go to the public for review.

Question: Will you give me a copy of EPA's previous comments? New forthcoming comments?

Answer: Yes.

Question: How can we trust that the new sampling will be done right and not falsified again?

Answer: Together with EPA's State regulatory partners, we commit to have our technical experts monitoring this rework every step of the way to ensure the safety of future residents and workers. We will send regulatory representatives to the site during retesting and we will do independent testing to check Navy results.

Question: Tetra Tech said the regulators gave back approval of its work on buildings after Tetra Tech redid some of the buildings scans. Is that true?

Answer: In 2016, after receiving indications that the scope of Tetra Tech's potential problems were considerably larger than previously thought, EPA and the State wrote a letter in 2016 confirming that no further transfers would occur before addressing the falsification concerns. EPA has not changed its position since then.

Commented [LL2]: Note: CDPH suspended its free release letters on 22 buildings in many parcels 11/2014. It restored the Parcel B and G letters in spring 2016, but more was still needed for other Parcels. It suspended all the letters again 5/2018.

Question: 3 buildings in Parcel G were demolished and removed after Tetra Tech EC Inc. claimed they were clean. What if they weren't clean? Where did the demolition debris go?

Answer: I believe the Navy had committed to follow up on this question. Please contact William Franklin, (619) 524-5433, [[HYPERLINK "mailto:william.d.franklin@navy.mil"](mailto:william.d.franklin@navy.mil)].

Question: The Navy proposes to take new background samples? Are they trying to move the goal posts to their advantage?

Answers: Some of the previous background samples were collected by Tetra Tech EC Inc. EPA has not evaluated previously collected background data to look for signs of potential falsification or data quality concerns. Given the uncertainty associated with previous Tetra Tech EC Inc. work, EPA has no objections to the Navy's proposal to collect new background samples as long as they are collected, analyzed, and evaluated in a manner that is scientifically sound and with proper oversight.

POLONIUM 210

Question: Through a FOIA request, Golden Gate University/Greenaction discovered that the Navy found Po-210 on bollards at Hunters Point. That very dangerous poison that was used to kill Russian spies and others. Could nearby residents be hurt by that?

Answer: The Polonium 210 that was found on bollards, which are short, thick post on the edge of a dry dock, to which a ship's rope may be secured. These areas are currently not accessible to the public due to fencing and security controls. Therefore, they do not create a current threat to the public.

Question: Could more Polonium 210 be on the site, but we don't know about it because Tetra Tech EC Inc. falsification covered it up?

Answer: EPA has recommended that the Navy re-evaluate previous Tetra Tech EC Inc. work at Ship Berths in addition to soil and buildings.

Question: Why hasn't the Navy gotten rid of the Polonium 210 yet?

Answer: EPA has recommended to the Navy that it remove the Polonium 210 found. EPA and the Navy are still working out a solution.

Question: Why hasn't anyone told the public about Polonium 210?

Answer: The Polonium 210 is in an area not currently accessible to the public. Therefore it is not an immediate health risk. EPA has recommended removal of the Polonium 210 found to prevent potential future public exposure after transfer of the property for redevelopment. EPA and the Navy are still working out a solution.